

AFFIDAVIT

I, Dennis Deason, being first duly sworn, do hereby depose and state that:

1. I am a Special Agent, U.S. Forest Service, and am authorized to investigate violations of Title 18, United States Code, Sections 1958 and 373.
2. On February 24, 2006, I was contacted by South Central Drug Task Force Officer Fred Stenger, who informed me that the Alton Police Department needed assistance with a murder for hire case. TFO Stenger informed me that Kari J. Brown had approached a confidential informant looking for someone to murder her husband. TFO Stenger provided the confidential informant with my pager number and told him/her to give the number to Brown so she could contact me.
3. On Saturday, February 25, 2006, a female subject called my pager wanting me to call her at 417-xxx-xxxx then stating her name was Kari. At approximately 1530 hours I placed a phone call to that number and a female answered. I asked the female if she still needed help with something and she said "yes I do". I told Kari Brown that I didn't want to discuss details on the phone and asked her if she would be willing to meet at the Wal-Mart parking lot in Thayer, Missouri and she agreed to meet on Tuesday, February 28, 2006.
4. On Tuesday, February 28, 2006, at approximately 1240 hours I arrived at the Wal-Mart parking lot in Thayer, Missouri. A few minutes later I observed a small child and a white female driving a red color Chevy Blazer bearing license number xxx-xxx approaching my location. The driver exited the vehicle and I asked her if she was Kari and she said yes. Kari Brown then provided me with a zip-loc bag containing a photograph of a man and a piece of paper with vehicle descriptions. I asked Brown if the man in the photograph was her husband that she wanted me to kill and she said yes. I asked Brown how was she going to get the money to pay me and she started naming off several items that she was going to sell.
5. At this point I told Brown that I would need three hundred dollars (\$300.00) for a down payment and a gun. Brown said that her step-daughter would bring her two hundred dollars (\$200.00) and should be arriving any moment. I also told Brown that I would need ten thousand (\$10,000.00) after her husband was dead and she guaranteed that it would be no problem to get the money even if she had to lay on her back to get it. I then asked her how soon she wanted this done and she said as soon as I could do it. I told Brown that I couldn't do it until March 13, 2006. I asked Brown why she wanted her husband dead and she stated the he had beaten her grand-daughter, beaten her daughter, beaten her and had brought methamphetamine into the house. I also asked Brown if she wanted me to just beat her husband or if she wanted him dead and she stated "I want him dead". Brown also said that once it's done meaning when her husband was dead and she could sell everything. I asked Brown how she wanted me to kill her husband and she said "I don't care". After a few more minutes of conversation,

Brown's step-daughter arrived at our location. Brown asked her if she got her check and the step-daughter replied no. At this time I told Brown to call me on March 13, 2006, to let me know if she had the money and gun. I then departed the area and noted the time as being approximately 1300 hours.

6. The zip-loc bag containing the photograph of Randy Brown and the paper with Randy Brown's vehicle descriptions will be submitted into Troop G evidence. The transaction was recorded a Sony NTII digital recording device.

7. Kari J. Brown is a white female with a date of birth of xx xx, 1969, approximately 5'6" in height and weighs approximately 160 pounds with blue eyes. Brown resides at Rt. x, Box xxxx, Alton, Missouri. She stated that she is in the process of divorcing Brown and has an acquaintance who is in jail for drugs. She stated this acquaintance brings methamphetamine from the St. Louis area and has been identified as John Carner, a previously convicted drug offender.

8. On Thursday, March 2, 2006, I received a message from Kari J. Brown wanting me to contact her by phone at 417/ xxx-xxxx. At approximately 1550 hours I called Brown at the number she had provided. Brown informed me that she had five hundred dollars (\$500.00) for a down payment to have her husband Randy R. Brown murdered. Brown also stated she wasn't able to come up with a gun. Brown further stated it would be easy to come up with the ten thousand dollars (\$10,000.00) after her husband was dead. I told Brown that I would call her the next day and make arrangement to get the five hundred dollars (\$500.00).

9. On Friday, March 3, 2006, at approximately 1830 hours I called Kari Brown at her residence and asked if she would be willing to meet with me on Saturday, March 4, 2006, and give me the five hundred dollars (\$500.00) to kill her husband. Brown agreed to meet me at 1200 hours at the Mammoth Springs State Park in Mammoth Springs, Arkansas.

10. On Saturday, March 4, 2006, at approximately 1100 hours I arrived at the Mammoth Springs State Park and parked my vehicle at a location between the ball field and the play ground. At approximately 1130 hours Kari J. Brown arrived at my location. Brown exited the vehicle with her three small children and took them to the play ground then returned to my location. Brown then handed me some money, as I counted the money Brown said she had to use some money for gas. I counted four hundred forty dollars (\$440.00) in U.S. Currency and she agreed that was what she had given me.

11. I told Brown that I would be gone until the week of March 13, 2006, that I wouldn't kill her husband until I returned. I asked Brown if she was sure she wanted to go through with this meaning to kill her husband and she said yes. I also said there's no backing out and she replied no. I also said "you want his ass dead" and Brown replied "yes". After a few more minutes of conversation I departed the area at approximately 1145 hours.

12. On Monday, March 13, 2006, at approximately 1430 hours I called Brown and told her I was looking at Wednesday as the day to kill her husband. Brown States that she was ready and had already started selling stuff. I asked Brown if I could kill her husband on Tuesday would she be able to give me some money and she said she could give me a thousand dollars (\$1,000.00) Tuesday evening. I told Brown that I would call her after I killed her husband.

13. Based on the foregoing, the Affiant has probable cause to believe that Kari Jolene Brown has committed offenses, in violation of Title 18, United States Code, Sections 1958 and 373.

/s/ Dennis W. Deason

Special Agent Dennis W. Deason
United States Forest Service

Sworn before me this 14th day of March, 2006.

/s/ James C. England

JAMES C. ENGLAND
CHIEF UNITED STATES MAGISTRATE JUDGE